

EXHIBIT A

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
MIDLAND/ODESSA DIVISION**

**INTELLECTUAL VENTURES I LLC and
INTELLECTUAL VENTURES II LLC,**

Plaintiffs,

v.

SOUTHWEST AIRLINES CO.,

Defendant.

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Civil Action No. 7:24-cv-00277-ADA

JURY TRIAL DEMANDED

DECLARATION OF S. WALLACE DUNWOODY

I, S. Wallace Dunwoody, hereby declare as follows:

1. I am an attorney licensed to practice law in the State of Texas and am admitted to practice before this Court. I am a partner at Munck Wilson Mandala, LLP and counsel of record for Defendant Southwest Airlines Co. (“Defendant” or “Southwest”).

2. I submit this Declaration in support of Defendant’s Notice of Partial Opposition to Plaintiff’s “Unopposed” Motion for Leave (Dkt#37).

3. During the meet and confer process concerning Plaintiffs’ request to amend its complaint and add new patents, the parties repeatedly discussed adding *four* new patents to the case. There was never any discussion of adding a fifth patent during the meet and confer process. When Plaintiffs circulated a draft mentioning adding five new patents, Defendants called it out as a mistake, but Plaintiffs moved forward with the filing as unopposed.

4. True and correct emails exchanged between counsel are attached hereto as Exhibits A-1 to A-6.

I declare under penalty of perjury that the foregoing is true and correct.

Date: May 27, 2025

/s/ S. Wallace Dunwoody
S. Wallace Dunwoody

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